

Appendix D
AGENCY RESPONSE LETTERS



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Governor Jane Dee Hull

Jacqueline Schafer, Director

July 12, 1999

Mr. Christopher M. Hugunin, Planner Coffman Associates 237 N.W. Blue Parkway, Suite 100 Lee's Summit, MO 64063

Re: Proposed Improvements to Holbrook Municipal Airport, Holbrook, Arizona

Dear Mr. Hugunin:

The Arizona Department of Environmental Quality Water Quality Division appreciates the opportunity to comment on the Proposed Improvements to Holbrook Municipal Airport. It appears that this project will be in the Leroux Wash watershed, within Hydrologic Unit Area (HUA) #15020009. The Arizona Department of Environmental Quality offers the following comments:

- 1. The Leroux Wash watershed (HUA #15020009) is a Category III watershed, indicating that there are within it pristine or sensitive aquatic system conditions on lands administered by federal, state or tribal governments.
- 2. The Leroux Wash watershed (HUA #15020009) is a Category IV watershed, indicating that no waterbodies within the watershed were assessed in 1998. For more information about the Unified Watershed Assessment or the Clean Water Action Plan in Arizona, please call the Arizona Department of Environmental Quality Watershed Unit at (602) 207-4507.
- 3. Rivers and Streams in the Leroux Wash watershed (HUA #15020009) include Digger Wash, Leroux Wash, the Little Colorado River, Sabito Wash and Wide Run Wash.

The Arizona Department of Environmental Quality recommends that:

- 1. The Management Agency and/or Owner/Operator should oversee all construction to ensure that discharges from the watershed or to Waters of the State and/or Waters of the U.S. meet all applicable Water Quality Standards;
- 2. Best Management Practices should be implemented to protect watershed condition and riparian areas, to maintain adequate vegetative cover, and to minimize the discharge of sediment, nutrients, bacteria and manure to the watershed or to all Waters of the State/Waters of the U.S.:

Addressee Page 2 July 12, 1999

- 3. Best Management Practices should be implemented during and after all construction phases to protect watershed condition and riparian areas, to maintain adequate vegetative cover, and to minimize the discharge of sediment, petroleum, nutrients, bacteria and other pollutants to the watershed or to all Waters of the State/Waters of the U.S.;
- 4. Best Management Practices should be implemented to minimize ground disturbance by mechanical equipment during construction activities;
- 5. A monitoring program should be implemented to evaluate the effectiveness of Best Management Practices in protecting watershed condition and Waters of the State;
- 6. Be aware that portable sources of air pollution, including rock, sand, gravel and asphaltic concrete plants, are required to be permitted by ADEQ before beginning operations. Contractors and subcontractors working on this project may be required to comply with these regulations. Contact the Arizona Department of Environmental Quality Air Quality Permits Section at (602) 207-2329;
- 7. Where applicable, the Management Agency and/or Owner/Operator should demonstrate a knowledge of waste streams, permits and hazardous materials handling and should indicate the destination of each hazardous waste being disposed off-site;
- 8. Public or semi-public water supply systems shall be developed to comply with <u>Public and Semi-Public Water Supply Systems Rules</u>. Contact the Arizona Department of Environmental Quality, Program Development & Outreach Unit, at (602) 207-4648 regarding assistance;
- 9. All underground storage tanks (USTs) must be registered with ADEQ. Contact the Arizona Department of Environmental Quality, Inspection and Compliance Unit at (602) 207-4329 regarding assistance in UST registration;
- 10. All solid wastes generated by the activity shall be transported to an ADEQ approved facility. Waste stored on-site for more than ninety (90) days, or that will be treated or disposed of on-site, may require facility approval. Contact the Arizona Department of Environmental Quality, Solid Waste Plan Review Unit at (602) 207-4122 regarding assistance in applying for this permit;
- 11. Sewage treatment facilities for human waste shall be planned and developed in such a manner as to ensure that both surface and groundwater resources are protected. An Aquifer Protection Permit (APP) may be required for such facilities. For assistance in applying for this permit, contact the Arizona Department of Environmental Quality, Aquifer Protection Program Section at (602) 207-4661;

Addressee Page 3 July 12, 1999

- 12. Sanitary waste facilities provided during construction phases shall be planned and developed so as to ensure that both surface and groundwater resources are protected;
- 13. An Aquifer Protection Permit (APP) may be required. Contact the Arizona Department of Environmental Quality Aquifer Protection Program Section at (602) 207-4661 regarding assistance in applying for this permit;
- 14. A Clean Water Act, Section 402, NPDES Permit is required for all ground-disturbing activities which exceed 5 acres in impact. Contact Mr. Robert Wilson at (602) 207-4574 with the Arizona Department of Environmental Quality regarding assistance in applying for this federal permit;
- 15. A Clean Water Act, Section 404 Permit may be required for the discharge of dredged or fill material into the navigable waters. Contact the US Army Corp of Engineers at (602) 640-5385 regarding a 404 Permit application. In addition, a Section 401 Certification from the Arizona Department of Environmental Quality may be required. Contact the Engineering Review and Permits Unit at (602) 207-4502 for assistance in obtaining certification; and
- 16. Numeric water quality standards listed in A.A.C. R18-11-109.G. and A.A.C. R-18-11-406 must be complied with, as well as narrative water quality standards in A.A.C. R-18-11-405. To obtain a copy of the A.A.C. R18-11-107, 108, 109, 405 and 406 water quality standards, call the Arizona Department of Environmental Quality, Water Quality Division Compliance Section at (602) 207-4466.

The Arizona Department of Environmental Quality would appreciate receiving information on the progress of this project. Thank you for your cooperation, should you have any questions, please contact me at (602) 207-4522.

Sincerely,

Ren Northup, Verde Watershed Project Manager

Water Quality Division

cc: Jack Bale, ADEQ Russell Smith, ADEQ Dan Salzler, ADEQ



KELSEY A. BEGAYE PRESIDENT WINDOW ROCK, ARIZONA 86515 • (520) 871-6000

TAYLOR McKENZIE, M.D. VICE PRESIDENT

July 21, 1999

Christopher M. Hugunin, C.M. Planner Coffman Associates 237 N.W. Blue Parkway, Suite 100 Lee's Summit, Missouri 64063

SUBJECT: Environmental Evaluation of Proposed Improvements to Holbrook Municipal Airport, Holbrook, Arizona.

Mr. Hugunin;

The following information on species of concern¹ is provided in response to your 30 June 1999 request concerning the subject project, which consists of the city of Holbrook, Navajo County, Arizona preparing an Airport Master Plan which defines the airport's role over the next twenty years and identifies future facility needs to support this role and meet projected demand.

At this time, the Navajo Fish and Wildlife Department (NFWD) has no record of species of concern occurring on the project site.

Species of concern known to occur within three miles of the project site include:

1. Astragalus xiphoides (gladiator milk-vetch).

Biological surveys should be conducted during the appropriate season. Surveyors on the Navajo Nation must be **permitted** by the Director, NFWD. Contact Jeff Cole at (520) 871-7068 for permitting procedures. Questions pertaining to surveys should be directed to the NFWD Zoologist (David Mikesic) for animals at 871-7638, and Botanist (Daniela Roth) for plants at 871-7639.

Potential impacts to wetlands should also be evaluated. The U.S. Fish & Wildlife Service's National Wetlands Inventory (NWI) maps should be examined to determine whether areas classified as wetlands are located close enough to the project site(s) to be impacted. In cases where the maps are inconclusive (e.g., due to their small scale), field surveys must be completed. For field surveys, wetlands identification and delineation methodology contained in the "Corps of Engineers Wetlands Delineation Manual" (Technical Report Y-87-1) should be used. When wetlands are present, potential impacts must be addressed in an environmental assessment and the Army Corps of Engineers, Phoenix office, must be

¹"Species of concern" include protected, candidate, and other rare or otherwise sensitive species, including certain native species and species of economic or cultural significance. For each species, the following tribal and federal statuses are indicated: Navajo Endangered Species List (NESL), federal Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), and Eagle Protection Act (EPA). No legal protection is afforded species with **only** ESA candidate or NESL group 4 status; please be aware of these species during surveys and inform the NFWD of observations. Documentation that these species are more numerous or widespread than currently known, and addressing these species in project planning and management is important for conservation and may contribute to ensuring they will not be uplisted in the future. Species without ESA or NESL legal protection (e.g., NESL group 4 species) are only included in responses on an irregular basis and may not be included in this response. Please refer to the NESL for a list of group 4 species; contact me if you need a copy.

contacted. NWI maps are available for examination at the NFWD's Natural Heritage Program (NHP) office, or may be purchased through the U.S. Geological Survey (order forms are available through the NHP). The NHP has complete coverage of the Navajo Nation, excluding Utah, at 1:100,000 scale; and coverage at 1:24,000 scale in the southwestern portion of the Navajo Nation.

The information in this report was identified by the NFWD's biologists and computerized database, and is based on current data. It should not be regarded as the final statement on the occurrence of any species, nor should it substitute for on-site surveys. Also, because the NFWD's information is continually updated, any given information response is only wholly appropriate for its respective request.

An invoice for this information is forthcoming from the Navajo Division of Finance.

If you have any questions I may be reached at (520) 871-7603.

Brent Nelson, Data Manager Natural Heritage Program

Navajo Fish and Wildlife Department

xc: file/chrono



Governor Jane Dee Huli

Commissioners: Chairman, Herb Guenther, Tacna

Michael M. Golightly, Flagstaff William Berlat, Tucson M. Jean Hassell, Scottsdale Dennis D. Manning, Alpine

> Director Duane L. Shroufe

Deputy Director Thomas W. Spalding

GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000 www.gf.state.az.us

HC 66 Box 57201, Pinetop, Arizona 85935 (520) 367-4281

August 10, 1999

Mr. Christopher M. Hugunin Coffman Associates 237 N.W. Blue Parkway Suite 100 Lee's Summit, MO 64063

Dear Mr. Hugunin,

The Arizona Game and Fish Department (Department) is in receipt of your June 30, 1999 request for input regarding the proposed improvements to the Holbrook Municipal Airport. The Department's Heritage Data Management System has been accessed and current records show that the special status species listed below have been documented as occurring in the project vicinity.

COMMON NAME	SCIENTIFIC NAME	STATUS
gladiator milk vetch	Astragalus xiphoides	SR
Peebles Navajo cactus	Pediocactus peeblesianus peeblesianus	LE, HS
paper-spined cactus roundleaf errazurizia Springerville pocket mouse	Pediocactus papyracanthus Errazurizia rotundata Perognathus flavus	S,SR SR
	goodpasteri	ន

STATUS DEFINITIONS

- LE Listed Endangered. Species identified by the U.S. Fish and Wildlife Service under the Endangered Species Act as being in imminent jeopardy of extinction.
- S Sensitive. Species classified as "sensitive" by the Regional Forester when occurring on lands managed by the U.S.D.A. Forest Service.

- HS Highly Safeguarded. Those Arizona native plants whose prospects for survival in this state are in jeopardy or are in danger of extinction, or are likely to become so in the foreseeable future, as described by the Arizona Native Plant Law (1993).
- SR Salvage Restricted. Those Arizona native plants not included in the Highly Safeguarded Category, but that have a high potential for theft or vandalism, as described by the Arizona Native Plant Law (1993).

We appreciate the opportunity to provide the above information and hope it proves useful in the NEPA analysis process for the proposed improvements to the Holbrook Municipal Airport. If you have additional questions, please contact the Pinetop Office at (520)367-4281.

Sincerely,

Sharen L. Adams

Habitat Program Manager

cc: John Kennedy, Project Evaluation Program Supervisor Log #07-06-99(01)



United States Department of Agriculture

Natural Resources Conservation Service

Planner

3003 N. Central Ave. Suite 800 Phoenix, AZ 85012-2945

Mr. Christopher M. Hugunin

Coffman Associates – Airport Consultants

237 NW Blue Parkway, Suite 100 Lee's Summit, Missouri 64063

Dear Mr. Hugunin:

This response is in regard to your letter dated June 30, 1999, concerning the Holbrook Municipal Airport Master Plan in the City of Holbrook, Arizona.

The Natural Resources Conservation Service (NRCS) has general responsibility, nationwide, for implementing the Farmland Protection Policy Act (FPPA) and to review projects that may affect prime farmland and/or wetlands associated with agriculture. After reviewing the information provided, the following is noted:

- 1. The specific project listed above, if implemented as planned, is exempt from the requirements of the FPPA - as revised in 1994, that excludes land which is already in or is committed to urban development, currently used as water storage or land that is not prime or unique farmland.
- 2. We do not see any immediate concerns or impacts that would directly affect wetland areas associated with agricultural activities.

Should you have questions, please feel free contact Jeff Schmidt, Community Assistance Coordinator at 602/280.8818. Thank you again for the chance to review the proposed projects.

Sincerely.

MICHAEL SOMERVILLE

State Conservationist

Scott Ferguson, District Conservationist, NRCS, Holbrook, Arizona Jim Briggs, Assistant State Conservationist (Technology), NRCS, Phoenix, Arizona Steve Smarik, Environmental Coordinator, NRCS, Phoenix, Arizona Jeff Schmidt, Community Assistance Coordinator, NRCS, Phoenix, Arizona

August 10, 1999



DEPARTMENT OF THE ARMY

LOS ANGELES DISTRICT, CORPS OF ENGINEERS P.O BOX 532711 LOS ANGELES, CALIFORNIA 90053-2325

REPLY TO ATTENTION OF:

August 25, 1999

Office of the Chief Regulatory Branch

Christopher M. Hugunin Coffman Associates 237 NW Blue Parkway Suite 100 Lees Summit, Missouri 64063-1869

Dear Mr. Hugunin:

Reference is made to your letter (No. 1999-16248-AOA) dated June 30, 1999 for a Department of the Army Permit to expand the existing Holbrook Municipal Airport, including the construction of new runways, in the vicinity of Leroux Wash in the City of Holbrook, Navajo County, Arizona.

Based on the information furnished in your letter, we have determined that one of your proposed runways in the western portion of the project area would discharge dredged or fill material into a water of the United States. Therefore, the project is subject to our jurisdiction under Section 404 of the Clean Water Act and a Section 404 permit is required from our office.

The receipt of your letter is appreciated. If you have any questions, please contact Aaron Allen of my staff at (213) 452-3413.

Sincerely,

Richard J. Schubel

Chief, Regulatory Branch

Enclosure



United States Department of the Interior

NATIONAL PARK SERVICE Petrified Forest National Park Arizona 86028

L7621 X N3615

July 30, 1999

VIA TELEFAX, ORIGINAL TO FOLLOW BY MAIL

Mr. Christopher M. Hugunin, C.M., Planner 237 N.W. Blue Parkway 100 Lee's Summit, MO 64063

Telefax: (816)524-2575

Dear Mr. Hugunin:

Thank you for your letter of June 30, 1999, inviting National Park Service input "regarding known environmental resources and sensitivities potentially associated with . . ." proposed improvements to the Holbrook Municipal Airport, Holbrook, Arizona. We appreciate the opportunity to comment at this stage of the process.

Holbrook, Arizona, is a gateway community for Petrified Forest National Park; the park, which consists of 93,533 acres in Navajo and Apache Counties, contains more than 50,000 of designated wilderness, officially the Petrified Forest National Wilderness Area. The wilderness area is comprised of two separate blocks of land: 43,020 acres in the northern (Painted Desert) portion of the park and 7,240 acres in the southern (Rainbow Forest) portion of the park.

While the National Park Service currently has no direct authority or jurisdiction over airspace above Petrified Forest National Park, the agency is committed to working with the Federal Aviation Administration (FAA), general aviation organizations, entities having jurisdiction over airports near the park, and, as necessary, appropriate agencies of the Department of Defense to prevent, eliminate, or minimize the derogation of park resources and values associated with overflight activity. In regards to general aviation operations over this unit of the National Park System, we wish to ensure that those operations are conducted in accordance with applicable FAA advisories and "fly friendly" techniques and procedures designed to help pilots minimize impacts on national parks. In Title 36 of the Code of Federal Regulations 2.17, the National Park Service has adopted the FAA regulations as part of the Service's regulations.

We recognize that there may be interest among the private sector in developing commercial air tours in whole or in part for the purpose of accessing Petrified Forest National Park for sightseeing, photography, or similar purposes. With improvements to the Holbrook Municipal Airport this interest might grow. We anticipate that in order to determine whether such commercial air tourism flights would be a legitimate visitor service at Petrified Forest National Park, the National Park Service would need to undertake a public planning process that would be conducted jointly with the FAA. That planning process would consider factors such as the potential value and appropriateness of commercial air tourism flights and the potential

impacts of such flights on park resources, park values, or desired visitor experiences. In its planning and decision-making related to commercial air tourism, the Service will consider commercial air tour passengers to be park visitors.

In light of the above information, we would ask that potential impacts on park resources, park values and desired visitor experiences at Petrified Forest National Park be included as an environmental consideration that needs to be analyzed in greater detail within the National Environmental Policy Act of 1969 (NEPA) process for the proposed airport improvements.

We would also like to call to your attention the fact that the proposed removal of historic structures outlined in the project description and accompanying exhibits may be subject to the compliance requirements of the National Historic Preservation Act, particularly if the proposed improvements will involve federal funding and/or federal permitting action. Thus, this proposed action should also be analyzed in more detail during the NEPA process.

Finally, we would suggest that if you have not already done so, you might include the following entities in your scoping process: AAA Aviation (the Fixed Base Operator for the Holbrook Municipal Airport); the Holbrook Aircraft Owners and Pilots Association (HAOPA); adjacent property owners (residential and business); and Tribal governments, particularly the Hopi Tribe and the Navajo Nation, regarding their concerns about any traditional cultural properties that might be affected by the proposed project.

We recognize that the proposed improvements to the Holbrook Municipal Airport would potentially enhance services for the community of Holbrook and area residents and also that the airport improvements might help to diversify and expand Holbrook's economic base by allowing the community to attract industries to the area.

In closing, we wish to thank you again for the opportunity to comment at this stage. We look forward to being actively involved in the NEPA process for the proposed improvements to the Holbrook Municipal Airport.

o Vicleson

Sincerely.

Michele M. Hellickson

Superintendent



Wayne Taylor, Jr.

CHAIRMAN

Phillip R. Quochytewa, Sr.

VICE-CHAIRMAN

Christopher M. Hugunin, C.M., Planner Coffman Associates 237 N.W. Blue Parkway, Suite 100 Lee's Summit, Missouri 64063

Dear Mr. Hugunin

This is in response to your letter dated June 30, 1999 regarding the Environmental Evaluation of Proposed Improvements to Holbrook Municipal Airport, Holbrook, Arizona. The Hopi Tribe, has determined that the proposed development described in the airport master plan is within the religious eagle collecting areas of the Bear Strap Clan from the Hopi Village of Shungopavi. However, the proposed project will not adversely impact known eagle nests.

Other Traditional Cultural Properties of concern to the Hopi Tribe which are near your project located in the area are Woodruff Butte and the Little Colorado River, which will not be impacted. The Hopi Tribe is very concerned about the areas around Woodruff Butte and the Little Colorado River because they are gathering areas for eaglets and medicinal plants utilized the Hopi people. Moreover, there are several Hopi Clans whose oral migration histories connect them to this area. While the Holbrook Municipal Airport site has already being impacted and disturbed, the Hopi Tribe requests you also submit to our office any archaeological survey reports that may have been performed in association with the proposed project.

If you have any questions. I can be reached at (520) 734-3751.

Sincerely

Kuwanwisiwma, Director

Cultural Preservation Office

Copy; cpo files

ltrs98



KELSEY A. BEGAYE PRESIDENT TAYLOR McKENZIE, M.D. VICE PRESIDENT

August 4, 1999

Christopher M. Hugunin, C.M. Planner Coffman Associates 237 N.W. Blue Parkway Suite 100 Lee's Summit, Missouri. 64063

RE: PROPOSED IMPROVEMENTS TO HOLBROOK MUNICIPAL AIRPORT, HOLBROOK, ARIZONA.

Dear Mr Hugunin:

The Navajo Nation Historic Preservation Department (HPD) Traditional Culture Program (TCP) is in receipt of your letter dated June 30, 1999. The letter outlines the Coffman Associates proposing an Environmental Evaluation on Improvements to Holbrook Municipal Airport in Holbrook, Arizona. We realize that the comment period has expired, however, please consider our comments on the Environmental Evaluation of the airport. Currently, the Navajo Nation has no concerns with the propose project. Proper planning for this project are in the best interest of all concerned communities.

The HPD-TCP would like to thank your office for including the Navajo Nation's concerns regarding the proposed project and for consulting with the Navajo Nation, pursuant to 36 CFR 800. 1(c)(2)(iii). Please forward any additional management drafts or plans to our program for review and comments. Should you have questions or concerns, contact our office at (520) 871-7146. Thank you.

Sincerely,

Timothy C. Begay, Navajo Cultural Specialist

Navajo Traditional Culture Program

Navajo Nation Historic Preservation Department

P.O. Box 4950

Window Rock, AZ. 86515

TEL: (520) 871-7146 FAX: (520) 871-7886

TCP 99-188/tcb

xc: Consultation Files-Coffman Associates-Lee's Summit, MO.

Chrono File



"Managing and conserving natural, cultural, and recreational resources"

August 2, 1999

Christopher M. Hugunin, C.M. Coffman Associates 237 N.W. Blue Parkway, Ste 100 Lee's Summit, MO 64063

Re: FAA/City of Holbrook/Improvements to Holbrook Airport

Dear Mr. Hugunin:

Thank you for submitting information regarding the above referenced undertaking. I have reviewed the material pursuant to 36 CFR Part 800 and have the following comments:

- 1. Given the size of the area of the proposed improvement project, our staff archaeologist, Carol Heathington, recommends that the area be surveyed by a qualified archaeologist in order to identify any archaeological resources that may be present.
- 2. I note that the brief description of the project includes "removing an existing aircraft storage hangar and house (constructed in the early 1940's to provide for future facility development)." This indicates the presence of historic properties that may be eligible for listing in the National Register of Historic Places. The information provided does not allow for an evaluation of eligibility. I recommend the airport facilities be evaluated by a qualified historic preservation consultant who can evaluate their eligibility.

If you have any questions or requests, please call me at (602) 542-7159.

Sincerely,

William S. Collins, Ph.D.

Historian

State Historic Preservation Office

William S. Collins

Jane Dee Hull Governor

State Parks Board Members

Chair Sheri J. Graham Sedona

Vernon Roudebush Safford

Walter D. Armer, Jr. Benson

> Suzanne Pfister Phoenix

Joseph H. Holmwood Mesa

Ruth U. Patterson St. Johns

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U.S Department of Transportation

Federal Aviation
Administration

Western-Pacific Region Airports Division

P.O. Box 92007 Worldway Postal Center Los Angeles, CA 90009

AUG 17 1999

Mr. Christopher M. Hugunin, C.M. Planner, Coffman Associates 237 N.W. Blue Parkway, Suite 100 Lee's Summit, MO 64063

Dear Mr. Hugunin:

This letter is in response to your letter of June 30, 1999, regarding proposed improvements to Holbrook Municipal Airport. You requested input on known environmental resources and sensitivities potentially associated with the proposed action.

The proposed 1,700-foot extension to Runway 11-29 will require the preparation of an Environmental Assessment (EA). The EA should be initiated 2 to 3 years prior to the planned construction timeframe.

The proposed new Global Positioning System (GPS) approach procedures may require the preparation of an EA. We recommend that your environmental evaluation address any noise impacts related to the proposed new approach procedures. The Federal Aviation Administration (FAA) will determine whether preparation of an EA is required.

The remaining projects are normally Categorically Excluded pursuant to Paragraph 23a of FAA Order 5050.4A, Airport Environmental Handbook. We recommend that your environmental evaluation address any impacts, extraordinary circumstances, or cumulative impacts associated with these projects that would require preparation of an EA. Guidance on these matters can be found in Paragraphs 22, 24, and 26 of the Order.

The regulations governing the assessment of impacts to historic properties listed or eligible for listing in the National Register of Historic Places were revised effective June 17, 1999. The revised regulations are set forth in 36 CFR Part 800, Protection of Historic Properties. We recommend that your environmental evaluation address each of the proposed projects potential to cause effects on historic properties.

If you have any questions, please contact me at (310) 725-3614.

Sincer#1

Brian Q. Armstrong

Airport Planner

Mickeal R. Agaibi Supervisor, Planning Section

cc: Mr. Jack Arend, Manager, Holbrook Municipal Airport



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Governor Jane Dee Hull

Jacqueline E. Schafer, Director

July 13, 1999

Mr. Christopher M. Hugunin, C.M. Coffman Associates 237 N.W. Blue Parkway, Ste. 100 Lee's Summit, MO 64063

Re: Environmental Evaluation of Proposed Improvements to Holbrook

Municipal Airport, Holbrook, Arizona

Dear Mr. Hugunin:

Thank you for the opportunity to comment on the project described above.

Based upon the information provided, the Arizona Department of Environmental Quality supports the project and has no comments.

Sincerely,

Jack B. Bale

Local Government Ombudsman

cc: Andra Juniel